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July 25, 2022

Via Electronic Case Filing

The Honorable Vincent L. Briccetti
United States District Court
Southern District of New York
United States Courthouse
300 Quarropas Street, Courtroom 630
White Plains, New York 10601

Re: *White Plains Aviation Partners, LLC, d/b/a Million Air White Plains v. The County of Westchester*, Case No. 21 Civ. 5312 (VB)

Dear Judge Briccetti:

This firm represents plaintiff White Plains Aviation Partners, LLC, d/b/a Million Air White Plains (“Million Air”), in the above-referenced action. I write on behalf of Million Air and Defendant the County of Westchester (“Defendant”), to jointly request a two-month extension of the remaining deadlines for fact and expert discovery set forth in the Court’s Civil Case Discovery Plan and Scheduling Order (Dkt. No. 32) (“Scheduling Order”).

Under the Scheduling Order, fact discovery is to be completed by August 15, 2022, expert discovery by September 29, 2022, and all discovery by October 14, 2022. To date, the parties have served and responded to written discovery requests, and have engaged in document production and conferred on several issues concerning that subject, and continue to do so. The parties require more time to complete this process given the anticipated significant volume of electronic discovery for both parties. In addition, because it would be most efficient to take depositions after the completion of document discovery, the parties have agreed to defer depositions until that process is completed. Finally, Million Air’s motion to amend the complaint currently is *sub judice*, and the Court’s resolution of that motion will guide the parties as to the scope of remaining discovery.

Accordingly, the parties now request that the Court extend by two months the remaining deadlines for fact and expert discovery set forth in the Scheduling Order, such that all discovery in the case would be completed by December 14, 2022. Per the Court’s Individual Practices, a proposed Revised Civil Case Discovery Plan and Scheduling Order is attached hereto. This is the parties’ first request for an extension of the discovery deadlines in this matter.

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The parties thank the Court for its consideration of this request.

Respectfully submitted,

YANKWITT LLP
Counsel for Million Air

By: /s/ Ross E. Morrison
Ross E. Morrison

(via ECF)
cc: All counsel of record